

## The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DAVITA INC.,

No. 2:19-cv-302-BJR

**Plaintiff,**

V<sub>a</sub>

VIRGINIA MASON MEMORIAL HOSPITAL,  
f/k/a YAKIMA VALLEY MEMORIAL  
HOSPITAL and YAKIMA VALLEY  
MEMORIAL HOSPITAL EMPLOYEE  
HEALTH CARE PLAN.

**STIPULATION AND ORDER FOR 30-DAY EXTENSION OF CERTAIN DEADLINES**

## Defendants.

**STIPULATION FOR 30-DAY EXTENSION  
OF CERTAIN DEADLINES**

Pursuant to the Court’s Order Regarding Initial Disclosures and submission of the Joint Status Report and Discovery Plan (the “Order”) [Dkt 52], the Court set dates for a Rule 26(f) conference, initial disclosures, and the submission of the Joint Status Report and Discovery Plan.

The parties are diligently working towards settling this case. They have exchanged draft settlement documents and expect a settlement in this case soon. The parties stipulate to and respectfully propose that the deadlines set forth in the Court's Order are extended for an additional 30 days.

1 Per the Court's Order, Plaintiff's counsel (with consent of defense counsel) reached out  
2 by telephone to the Courtroom Deputy Clerk on July 9, 2021, regarding the stipulated extension,  
3 and were told to submit the request via a Stipulation and Proposed Order. The Court previously  
4 granted three extensions of these deadlines in 2021 on March 25, 2021, May 4, 2021, and May  
5 28, 2021, per request of the parties in order for the parties to work on settling this case.

6 No parties will be prejudiced by the extension.  
7

8 **IT IS SO STIPULATED.**

9 Dated: July 9, 2021

---

10 **KELLER ROHRBACK L.L.P.**

11 /s/ Erin M. Riley  
12 Erin M. Riley, WSBA #30401  
13 1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
T: (206) 623-1900 | F: (206) 623-3384  
eriley@kellerrohrback.com

14 **ARNOLD & PORTER KAYE SCHOLER LLP**

15 Colin O'Brien (*pro hac vice*)  
16 Timothy R. Macdonald (*pro hac vice*)  
17 1144 Fifteenth Street, Suite 3100  
Denver, CO 80202-2569  
18 T: (303) 863-2360 | F: (303) 863-2301  
colin.obrien@arnoldporter.com  
timothy.macdonald@arnoldporter.com

19  
20 Attorneys for Plaintiff Davita Inc.

21 Dated: July 9, 2021

22 **DAVIS WRIGHT TREMAINE L.L.P.**

23 /s/ Richard Birmingham  
Richard Birmingham, WSBA #8685  
24 920 Fifth Avenue, Suite 3300  
Seattle, WA 98104  
T: 206-622-3150  
F: 206-757-7700  
richbirmingham@dwt.com

25  
26 Christine Hawkins, WSBA #44972

1                   929 108<sup>th</sup> Avenue NE, Suite 1500  
2                   Bellevue, WA   98004  
3                   T: 206-622-3150  
4                   F: 206-757-7700  
5                   christinehawkins@dwt.com

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*Attorneys for Defendants*

## ORDER

Having reviewed the foregoing Stipulation by the parties (Dkt. No. 53), and finding that good cause exists for the requested relief, the Court HEREBY GRANTS the relief requested as follows:

The FRCP 26(f) conference deadline is extended to August 2, 2021.

The initial disclosures deadline is extended to August 9, 2021.

The joint status report deadline is extended to August 16, 2021.

DATED July 9, 2021.

Barbara Rothstein

Barbara Jacobs Rothstein  
United States District Judge